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7 Attorneys for Plaintiffs
   ANA BIOCINI, et al.
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9   **UNITED STATES DISTRICT COURT**
10   **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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12 ANA BIOCINI, et al.,   Case No.: 3:14-cv-03315-TEH

13   Plaintiffs,   **DECLARATION OF DEWITT M.**
              v.   **LACY IN SUPPORT OF PLAINTIFFS'**
14   **OPPOSITION TO DEFENDANTS'**
                    Plaintiff,v.   **MOTION FOR SUMMARY**
15 CITY OF OAKLAND, a municipal   **JUDGMENT**
    corporation; CARLOS NAVARRO,
16 individually and in his capacity as an officer
    for the CITY OF OAKLAND Police
17 Department; IRA ANDERSON, individually   Date: January 11, 2015
    and in his capacity as an officer for the CITY   Time: 10:00 a.m.
18 OF OAKLAND Police Department; STEVEN   Place: Courtroom 2, 4th Floor
    STOUT, individually and in his capacity as an
19 officer for the CITY OF OAKLAND Police
    Department; and DOES 1-25, inclusive,   Thelton E. Henderson, Judge
20 individually and in their official capacity as
    police officers for the CITY OF OAKLAND,
21 jointly and severally,
22
23   Defendants.

24

25 I, DeWitt M. Lacy, hereby declare:

26 1. I am one of the attorney of record for Plaintiff. This declaration is submitted in support of

27 Plaintiffss Opposition to Defendants' Motion for Summary Judgment, in the above-captioned

28 *Biocini, et al. v. City of Oakland*, et al., 3:14-cv-03315-TEH   1
    Declaration of DeWitt M. Lacy in Support of Plaintiffs' Opposition to Defendants' Motion
    for Summary Judgment

1 matter.

2 2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff Ana Biocini's Deposition

3 Transcript, pertaining to this matter.

4 3. Attached hereto as Exhibit B is a true and correct copy of Defendant Carlos Navarro's

5 Deposition Transcript, pertaining to this matter.

6 4. Attached hereto as Exhibit C is a true and correct copy of Defendant Ira Anderson's

7 Deposition Transcript, pertaining to this matter.

8 5. Attached hereto as Exhibit D is a true and correct copy of Witness Abel Medina's Deposition

9 Transcript, pertaining to this matter.

10 7. Attached hereto as Exhibit E is a true and correct copy of Defendant Stephen Stout's

11 Deposition Transcript, pertaining to this matter.

12 8. Attached hereto as Exhibit F is a true and correct copy of a video recording depicting the

13 subject incident, pertaining to this matter.

14 9. Attached hereto as Exhibit G is a true and correct copy of a Witness Justin James' Deposition

15 Transcript, pertaining to this matter.

16 10. Attached hereto as Exhibit H is a true and correct copy of a medical record from the

17 paramedics that responded to the scene on the July 8, 2013 to give medical aid to Decedent

18 Hernan Jaramillo.

19 11. Attached hereto as Exhibit I is a true and correct copy of the Oakland Police Department

20 General Order pertaining to the detention and arrest of mentally disturbed persons.

21 I declare under penalty of perjury under the laws of the State of California that the

22 foregoing is true and correct of my personal knowledge, except where stated on information and

23 belief, and to those matters I am informed and believe them to be true. If called as a witness, I

24 would competently testify to those matters stated herein

25

26 Executed August 20, 2015, at Oakland, California.

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28 *Biocini, et al. v. City of Oakland*, et al., 3:14-cv-03315-TEH   2
Declaration of DeWitt M. Lacy in Support of Plaintiffs' Opposition to Defendants' Motion
for Summary Judgment

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/s/ DeWitt M. Lacy
DeWitt M. Lacy
Attorney for Plaintiff

Biocini, et al. v. City of Oakland, et al., 3:14-cv-03315-TEH   3
Declaration of DeWitt M. Lacy in Support of Plaintiffs' Opposition to Defendants' Motion
for Summary Judgment